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Counsel for Motorola Inc.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., et al.,  
  
Debtors.

Chapter 11

Case No. 08-35653 (KRH)  
(Jointly Administered)

**PRELIMINARY RESPONSE OF MOTOROLA INC. TO DEBTORS' NINETEENTH  
OMNIBUS OBJECTION TO CLAIMS (RECLASSIFICATION OF CERTAIN  
MISCLASSIFIED CLAIMS TO GENERAL UNSECURED, NON-PRIORITY CLAIMS)**

Motorola Inc. ("Motorola"), by and through its undersigned counsel, submits its Preliminary Response (the "Preliminary Response") to the Debtors' Nineteenth Omnibus Objection to Claims (Reclassification of Certain Misclassified Claims to General Unsecured, Non-Priority Claims) (the "Objection"), and in support respectfully states as follows:

1. On or about January 29, 2009, Motorola filed a proof of claim against Debtor Circuit City Stores, Inc. for \$1,516,837.80, which is listed by the Debtors as claim number 7552 (the "Claim"). On or about June 22, 2009, the Debtors filed the Objection. Pursuant to the

Objection, the Debtors seek to reclassify a \$50,000 secured claim under section 506(a) of the Bankruptcy Code to a general unsecured claim. Motorola objects to the relief requested in the Objection.

2. Motorola files this Preliminary Response in lieu of a formal pleading pursuant to the Debtors' authorization to Motorola's counsel on July 8, 2009. Accordingly, Motorola reserves all rights with respect to the Claim and the right to supplement the Preliminary Response at a later date.

3. Contact information for Motorola is as follows:

Motorola, Inc.  
101 Tournament Drive  
Horsham, PA 19044  
ATTN: Angela Urban (215) 323-1760

WHEREFORE, Motorola respectfully requests that the Claim be excluded from any order approving the Objection and such other relief as is just and proper.

Date: July 15, 2009

**BUCHANAN INGERSOLL & ROONEY PC**

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Counsel to Counsel for Motorola Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Preliminary Response of Motorola Inc. to Debtors' Nineteenth Omnibus Objection to Claims (Reclassification of Certain Misclassified Claims to General Unsecured, Non-Priority Claims)* was filed electronically with the court via the CM/ECF system on the 15th day of July, 2009 and first-class mail to the following:

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United States Bankruptcy Court  
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